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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 DANNY KASTER,

16 Plaintiff,

17 vs.

18 SELECT PORTFOLIO SERVICING;
19 INNOVIS DATA SOLUTIONS, INC.; AND
20 FORD MOTOR CREDIT COMPANY LLC,

21 Defendants.

Case No.: 2:19-cv-02180-RFB-VCF

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S MOTION TO COMPEL
(FOURTH REQUEST)**

22 Plaintiff, Danny Kaster ("Plaintiff"), and Defendant, Select Portfolio Servicing, Inc.
23 ("SPS") (collectively the "Parties"), by and through their counsel of record, hereby stipulate and
24 agree as follows:

25 On March 20, 2020, Plaintiff filed his Motion to Compel [ECF No. 27]. As such, SPS'
26 deadline to respond to the Motion to Compel was originally April 3, 2020. The Parties then
27 jointly moved the Court to extend the deadline to April 10, 2020 [ECF No. 29]. The Parties then
28 jointly moved the Court to extend the deadline to April 24 [ECF No. 34]. The Parties then
jointly moved the Court to extend the deadline to May 1 [ECF No. 36]. The Parties have
discussed extending the deadline for SPS to respond to Plaintiff's Motion to Compel by an
additional two weeks to allow SPS additional time to respond to the Motion to Compel. The
parties are continuing to discuss a possible resolution to their discovery dispute and believe they
can either partially or fully resolve with the additional time. They are also continuing to discuss
a global resolution of the entire matter.

1 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for SPS to file
2 its response to Plaintiff's Motion to Compel to May 15, 2020.

3 This is the fourth stipulation for extension of time for SPS to file its response to the
4 Motion to Compel. The extension is requested in good faith and is not for purposes of delay or
5 prejudice to any other party.

6 DATED this 1st day of May, 2020.

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8 WRIGHT, FINLAY & ZAK, LLP

KNEPPER & CLARK LLC

9 /s/ Ramir M. Hernandez, Esq.

/s/ Miles N. Clark, Esq.

10 R. Samuel Ehlers, Esq.

Matthew I. Knepper, Esq.

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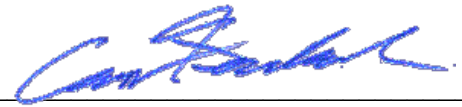
5510 S. Fort Apache Rd, Suite 30

Servicing, Inc.

Las Vegas, NV 89148-7700

Attorneys for Plaintiff, Danny Kaster

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16
17 IT IS SO ORDERED:

18 

19 UNITED STATES MAGISTRATE JUDGE

20 5-4-2020

21 DATED: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND DEADLINE TO RESPOND TO PLAINTIFF'S MOTION TO COMPEL (FOURTH REQUEST)** on the 1st day of May, 2020, to all parties on the CM/ECF service list.

/s/ Jason Craig

An Employee of WRIGHT, FINLAY & ZAK, LLP